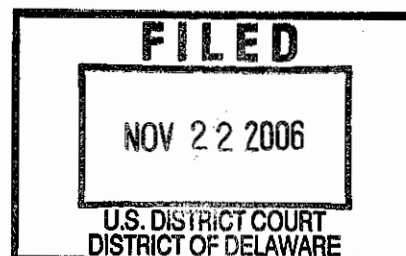


TO: Dana Spring Monzo

First Correctional Medical
DefendantsFrom: Harry Samuel
PlaintiffU.S. District Court
Order 15th day of
November RE: Discovery
Civ. No. 05-037-SLRAdditional Discovery Request for FCM

Pursuant to rule 33 and 34, Fed. R. Civ. P., the Plaintiff submits the following interrogatories and request for documents to the defendants. You are directed to answer each of the interrogatories in writing under oath, and produce each of the requested documents for inspection and copying within 30 days of service. This discovery was mailed to your office on 11-20-2006. All discovery requests shall be served and filed on or before January 16, 2007.

17. ANY and all of the Delaware Correctional Center and First Correctional Medical Regulations and Policies on handcuffs Mechanical Restraints, insofar as Mechanical restraints handcuffs shall never be used in a way that causes undue physical discomfort, inflicts physical pain or in any way restricts the blood circulation or breathing of an inmate, insofar as the handcuffs pertain to Plaintiff being forced to wear handcuffs in the rear while in the dental chair while Plaintiff was forced to be handcuffed in the rear during dental treatment by correctional officer Rob Young in September, 2004 to September 2005, (10-7-2004).
18. State the name, Title and Duty of the person responsible for the regulations and policies on Mechanical Restraints in the FCM/ Delaware Correctional Center MHU on 10-7-2004 and (September, 2004 to September 2005), insofar as the restraints pertain to while a inmate is being seated in and sitting in the dental chair while handcuffed in the rear during dental treatment the handcuffs shall never be used in a way that causes undue physical discomfort, inflicts physical pain or in any way restricts the blood circulation.



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19. State the name, Title and Duty of Rob Young's Supervisor on 10-7-2004 (September, 2004 to September, 2005) on the 8 to 4 shift that is responsible for Rob Young's actions. Insofar as they pertain to over seeing Rob Young's use of Mechanical restraints handcuffs on inmates/Plaintiff, in the rear during Dental Treatment, Pertaining to restraint handcuff Regulations that ensure that handcuffs are not to be use in a manor to Cause undue discomfort or inflict Pain while a inmate is seated and getting Treatment in the Dental Chair. Produce the Document.
20. Any and all of the Delaware Correctional Center and First Correctional Medical Regulations and Policy on Dening and Delaying filling a Inmate/Plaintiff Tooth. Insofar as the Regulations and Policy Pertain to Denial and Delay of filling a Inmate/Plaintiff, Tooth shall not be Denied or Delayed in a way that Cause a Inmate/Plaintiff undue Suffering and Pain. Produce the Document. from 10-7-2004 (9, 2004 to 9, 2005).
21. State the name, Title and Duty of the Delaware Correctional Center Staff member and First Correctional Medical Staff member and or Person Responsible for the DCC and FCM Regulations and Policy, Insofar as the staff member or Person oversees the Regulations and Policy in ensuring that filling a Inmate/Plaintiff Tooth is done in a timely manor that do not Cause undue Suffering and Pain. Produce the Document. from 10-7-2004 (9, 2004 to 9, 2005).
22. State the Reason it took a Year to fill Plaintiff's Tooth. From 9, 2004 to 9, 2005 and why FCM never filled Plaintiff Tooth at all.
23. State how many months FCM should fill a Inmate/Plaintiff's Tooth which is an acceptable standard of decency.
- Plaintiff do not seek Personal information. Plaintiff seek Discovery insofar as the Claims in dispute.

Date: 11-20-2006

Respectfully Submitted
Very Truly yours
Harry L. Samuel, prose

Certificate of Service

I, Harry Samuel, hereby certify that I have served a true
and correct copy(ies) of the attached: Additional Discovery
Request for FCM upon the following
parties/person (s): oposing

TO: Dana Spring Monzo TO: _____
First Correctional Medical _____
1225 N. King Street, suite 1100 _____
P. O. Box 397 _____
Wilmington, Delaware _____
19899-0397 _____

TO: _____ TO: _____

BY PLACING SAME IN A SEALED ENVELOPE and depositing same in the United States Mail at the Delaware Correctional Center, 1181 Paddock Road, Smyrna, DE 19977.

On this 20th day of November, 2006

Harry L. Samuel, Pro se

IM Harry Samuel

SBI# 201360 UNIT 23,B,2,U

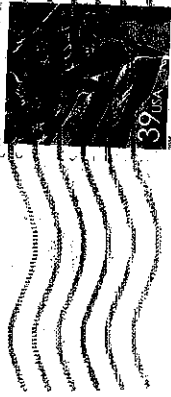
DELAWARE CORRECTIONAL CENTER

1181 PADDOCK ROAD

SMYRNA, DELAWARE 19977

WILMINGTON DE 197

21 NOV 2006 PM 2 T



TO. Office of the Clerk

United States District Court

844 N. King Street, Lockbox 18

Wilmington, Delaware

19801-3570

Legal Mail

U.S. MAIL
K. GRAY